



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

JAMES E. JOHNSON  
*Corporation Counsel*

USDC SDNY  
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JORGE M. MARQUEZ  
*Senior Counsel*

Phone: (212) 356-2336

Fax: (212) 356-3558

Email: jmarquez@law.nyc.gov

November 6, 2020

**Granted. SO ORDERED.**

**VIA E.C.F.**

Honorable Mary K. Vyskocil  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Date: 11/9/2020  
New York, New York

*Mary Kay Vyskocil*  
Mary Kay Vyskocil  
United States District Judge

RE: Cristina Winsor v. City of New York,  
19 Civ. 6462 (MKV)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to represent defendants City of New York and Police Officers Regina Vazquez and Christopher Mulvey (collectively, "Defendants") in the above referenced action. The parties file this joint letter to respectfully request that the Court provide the parties with an additional week within which the parties may: (1) file a Proposed Judgement incorporating the \$20,001 required by operation of Rule 68 as well as an agreed-upon amount of attorney's fees, expenses, and costs; or, if the parties cannot successfully agree on a single Proposed Judgment, (2) file a Proposed Judgment to cover the \$20,001 required by operation of Rule 68 and Plaintiff may make an application to the Court to fix the Plaintiff's attorney's fees, expenses, and costs. This is the second joint application concerning this request. (See E.C.F. Nos. 36 and 37.)

On October 9, 2020, the parties requested an extension of time to continue with one out of the two proposed courses of action concerning the Plaintiff's acceptance of the Defendants' Rule 68 Offer of Judgement by November 12, 2020. (E.C.F. No. 36.) The Court granted said request. (E.C.F. No. 37.)

The parties are engaging in good faith negotiations. Plaintiff's counsel has recently disclosed timesheets to Defendants; Defendants require an additional week to assess them. Accordingly, the parties respectfully request a one-week extension of time, from November 12, 2020, to November 19, 2020, wherein the parties may follow one of the two proposed courses of action stated in this letter.

Thank you for your attention to this matter.

Respectfully submitted,

*Jorge Marquez /S/*

Jorge M. Marquez

*Senior Counsel*

Special Federal Litigation Division

cc: **VIA E.C.F.**  
All counsel of record